

-and-

*Counsel for Defendants Invar Consulting Ltd., Genometrica Ltd., and Genometrica Research, Inc.*

VERA GORFINKEL,

Plaintiff,

-against-

RALF VAYNTRUB, INVAR CONSULTING  
LTD., GENOMETRICA LTD. and  
GENOMETRICA RESEARCH, INC.

**Defendants.**

Case No.: 13-cv-3093 (PKC) (AKT)

## NOTICE OF MOTION

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law, the accompanying Declaration of Robert Kenney, the accompanying Declaration of Alina Orban, and the accompanying Declaration of Aleksandr Vaintrub, and all prior papers and proceedings

had herein, Defendants INVAR CONSULTING LTD., GENOMETRICA LTD., and GENOMETRICA RESEARCH, INC. (collectively, the "Served Defendants")<sup>1</sup> will move this Court, before the Honorable Pamela K. Chen, at such time as counsel may be heard, for an order pursuant to Federal Rule of Civil Procedure 12(b)(6) dismissing Plaintiff VERA GORFINKEL'S amended complaint, and granting such other and further relief as this Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the briefing schedule so ordered by this court on July 2, 2013, opposition papers, if any, to the Served Defendants' motion to dismiss, shall be served on undersigned counsel on or before August 22, 2013.

Dated: New York, New York  
August 1, 2013

Respectfully submitted,

**HOFHEIMER GARTLIR & GROSS, LLP**

By: /s/Robert Kenney  
Robert Kenney  
Nicholas B. Malito  
530 Fifth Avenue  
New York, New York 10036  
Telephone: (212) 818-9000  
Facsimile: (212) 869-4930  
Email: [rkenney@hgg.com](mailto:rkenney@hgg.com)  
[nmalito@hgg.com](mailto:nmalito@hgg.com)

-and-

Panagiota Betty Tufariello  
INTELLECTULAW  
THE LAW OFFICES OF P.B. TUFARIELLO, P.C.  
25 Little Harbor Road  
Mount Sinai, New York 11766  
Telephone: (631) 476-8734  
Facsimile: (631) 476-8737  
Email: [betty@intellectulaw.com](mailto:betty@intellectulaw.com)

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<sup>1</sup> Defendant Ralf Vayntrub resides overseas and has not been served with any pleadings despite the fact that this action has been pending for almost one and a half years.

To: Arthur Morrison  
11 Skyline Drive  
Hawthorne, New York 10532  
[akatz@xand.com](mailto:akatz@xand.com)  
[amorrison@xand.com](mailto:amorrison@xand.com)  
[lawnyu63@gmail.com](mailto:lawnyu63@gmail.com)

William V. Rapp  
85 River Road  
Scarborough, New York 10510  
[william.v.rapp@njit.edu](mailto:william.v.rapp@njit.edu)  
[rappw@njit.edu](mailto:rappw@njit.edu)  
[william.rapp@law.nyu.edu](mailto:william.rapp@law.nyu.edu)  
[wvr201@nyu.edu](mailto:wvr201@nyu.edu)

Robert Greenberg  
Robert Greenberg, P.C.  
228 Park Avenue South  
New York, New York 10003  
[rgreenberg@robertlgreenberg.com](mailto:rgreenberg@robertlgreenberg.com)

Gregory Koerner  
Koerner Law Firm  
111 John Street, Suite 230  
New York, New York 10038  
[gkoerner@koerner-associates.com](mailto:gkoerner@koerner-associates.com)  
[gokoerner@gmail.com](mailto:gokoerner@gmail.com)